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8 Attorneys for Defendant
9 Ziad Takieddine

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 Squire, Sanders & Dempsey, L.L.P.

14 Plaintiff,

15 vs.

16 Ziad Takieddine,

17 Defendant.

) **Case No. CV 09 3699 SI**

) **STIPULATION TO RESCHEDULE**
) **SETTLEMENT CONFERENCE AND**
) **PROPOSED ORDER**

) Hon. Susan I. Illston

) Complaint Filed: August 12, 2009

1 WHEREAS, the parties agreed to expedited scheduling of this lawsuit such that
2 fact discovery closes on September 3, 2010, dispositive motions are due no later than
3 October 8, 2010, and a trial would be held on December 20, 2010;

4 WHEREAS, the parties agreed to attend a Settlement Conference with a
5 magistrate judge substantially prior to the deadline for filing dispositive motions;

6 WHEREAS, Magistrate Judge Zimmerman scheduled a Settlement Conference for
7 August 31, 2010;

8 WHEREAS, plaintiff Squire, Sanders & Dempsey L.L.P. ("SSD") noticed Mr.
9 Takieddine's deposition to take place a day prior to the scheduled Settlement Conference
10 on August 30, 2010, to take advantage of Mr. Takieddine's attendance of the Settlement
11 Conference;

12 WHEREAS, counsel for defendant Ziad Takieddine notified Mr. Takieddine on
13 August 25, 2010, that he will move to withdraw as counsel for Mr. Takieddine;

14 NOW, THEREFORE, THE PARTIES, THROUGH THEIR COUNSEL,
15 STIPULATE AS FOLLOWS:

16 The Settlement Conference, which is currently scheduled for August 31, 2010,
17 shall be reset to the first available and mutually convenient date after defense counsel's
18 motion is heard and ruled upon, but in no event shall be later than October 1, 2010.
19 Should Mr. Takieddine not appear for his scheduled deposition on August 30, 2010, SSD
20 shall be entitled to take Mr. Takieddine's deposition up to October 8, 2010
21 notwithstanding the current fact discovery cut-off date. Other than Mr. Takieddine's
22 deposition, no other fact discovery shall be permitted after the date currently set for the
23 close of fact discovery.


DATED: August ___, 2010

By: /S
Joseph A. Meckes

HINSHAW & CULBERTSON LLP

By: /S
David L. Winnett
Attorneys for Defendant
Ziad Takieddine

DATED: March __, 2010

By: 
Susan Illston
Judge of the United States District Court

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